

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§ Chapter 11 Case
	§
Old LC, Inc., <i>et al.</i> ¹	§ Case No. 19-11791 (BLS)
	§
Debtors.	§ Jointly Administered

Official Committee of Unsecured Creditors
of Old LC, Inc., et al., for and on behalf of
the estates of Old LC, Inc., *et al.*;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit
Opportunities Fund, L.P.; Upfront GP V,
LLC; Mark Suster; Dana Kibler; Gregory
Bettinelli; Saif Mansour; Aamir Amdani;
Eric Beckman; Darrick Geant; and Joseph
Kaczorowski

Defendants.

§ Adv. No. 20-51002 (BLS)

CERTIFICATION OF COUNSEL

The undersigned counsel for the Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., et al.; (the “Plaintiff”) hereby certifies as follows:

1. Following a conference with the Court on September 15, 2021, the Plaintiff circulated a form of proposed scheduling order, a copy of which is attached hereto as Exhibit “A”

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

(the “Scheduling Order”) reflecting the Court’s ruling on the contested issues. Counsel for the defendants have no opposition to the Scheduling Order.

2. The Plaintiff requests entry of the Scheduling Order at the Court’s earliest convenience.

Dated: September 17, 2021

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

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